

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc., Instagram, LLC, Meta  
Payments, Inc., Meta Platforms Technologies,  
LLC

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Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta  
Payments, Inc.

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State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook  
Holdings, LLC, Facebook Operations, LLC, Meta  
Payments, Inc., Meta Platforms Technologies,  
LLC, Siculus, Inc.

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IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:  
4:22-md-03047; 4:23-cv-05448; 4:23-cv-05885;  
4:24-cv-00805

MDL No. 3047

Case No. 4:22-md-03047-YGR  
4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

**DECLARATION OF BIANCA MIYATA  
IN SUPPORT OF STATE ATTORNEYS  
GENERAL'S ADMINISTRATIVE  
MOTION FOR STAY**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

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2 I, BIANCA MIYATA, declare and state as follows:

3 1. I am a Senior Assistant Attorney General in the Consumer Protection Section of the  
4 Colorado Department of Law. I am a member of good standing of the State Bar of Colorado. I make this  
5 declaration based on my own personal knowledge. If called upon to testify, I could and would testify  
6 completely to the truth of the matters stated herein.

7 2. I submit this declaration, as required by Civil Local Rule 7-11, in support of the State  
8 Attorneys General's Administrative Motion for Stay.

9 3. On September 6, 2024, this Court issued its Order Granting-in-Part and Denying-in-Part  
10 Meta's Request for Party Discovery on Third-Party State Agencies Pursuant to Fed. R. Civ. P. 34 and  
11 Granting Meta's [sic]<sup>1</sup> First, Second, and Third Administrative Motions for Leave to File Supplemental  
12 Information. Doc. 1117.

13 4. The State AGs intend to file an objection to the Order through a Motion for Relief on  
14 September 20, 2024.

15 5. The State AGs seek a stay of the Order pending Judge Gonzalez Rogers' resolution of their  
16 objection and Motion for Relief.

17 6. On September 19, 2024, counsel for Meta wrote that they cannot consent to a stay due to  
18 concerns about undue delay and Meta's need to progress discovery from the State AGs.

19 7. The State AGs submit this declaration in lieu of a stipulation because Meta has indicated  
20 that it cannot consent to a stay.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on September  
22 20, 2024, in Denver, Colorado.

23 /s/ Bianca E. Miyata

24 BIANCA E. MIYATA

25 Senior Assistant Attorney General

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27 <sup>1</sup> The caption of the Order refers to "Meta's" Administrative Motions. In the Order, the Court granted  
28 the State AGs' three Administrative Motions for Leave to File Supplemental Information (Doc. 1031,  
1074, and 1110). The reference to "Meta's" Motions appears to be a minor typographical error.